

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

In Re:

MARY SLAEY

Debtor.

Chapter 11

Case No. 13-10541-RGM

**AMENDED DEBTOR'S OBJECTION TO PROOF OF CLAIM #15-2**  
**(P.H. Harrington, Jr.)**

COMES NOW Debtor Mary Slaey, by counsel, and notes her amended objection pursuant to F.R. Bankr. P. 3007 to the following claim:

<b>CLAIMANT</b>	<b>AMOUNT</b>	<b>CLAIM NUMBER</b>
P.H. Harrington, Jr.	\$523,706.38	15-2

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**STATUTE OF LIMITATIONS**

1. All claims of P.H. Harrington, Jr. ("Hereafter "Harrington") are time barred by the statute of limitations. Virginia Code Section 8.3A-118(a). Any waiver of the statute of limitations is void. Virginia Code Section 8.01-232.

**FIRST NOTE - \$235,000**

2. The Debtor denies signing the First Note for \$235,000.00.
3. The Debtor asserts that, on or about September 26, 2002, \$221,628.40 was paid on the Note.
4. The Debtor denies that the First Note was a personal obligation.

**SECOND NOTE - \$47,632.38**

5. The Debtor denies that the Second Note is a personal obligation.

WHEREFORE, Mary DeNese Slaey prays for entry of an Order disallowing Claim 15-2 filed on behalf of P.H. Harrington, and for such other and further relief as this Court deems just and proper.

Mary DeNese Slaey  
By Counsel

/s/ Gregory H. Counts  
Gregory H. Counts, VA Bar #46771  
Tyler, Bartl, Ramsdell, & Counts, P.L.C.  
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703-549-5000; Fax: 703-549-5011  
Counsel to Debtor

CERTIFICATE OF SERVICE

I hereby certify that on this 19 day of September, 2013, the Debtor's Objection to Claim was sent electronically and/or mailed first class postage prepaid, to the following:

Christopher S. Moffitt, Esq.  
Counsel to P.H. Harrington

/s/ Gregory H. Counts  
Gregory H. Counts